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June 4, 2008

Hon. Jed S. Rakoff, U.S.D.J.
United States Courthouse
500 Pearl Street
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
FILED: 6-5-08

Re: United States v. Steven Laino, 08 Crim. 413 (JSR)

Dear Judge Rakoff:

This office represents Defendant Steven Laino in the above-referenced matter. Mr. Laino is scheduled to be sentenced by this Court on August 26, 2008.

This afternoon, AUSA Julian Moore and I participated in a brief telephonic conference call with Your Honor's law clerk, Gabriella Geanuleas. I was directed to submit a brief written request for the Court's consideration.

Mr. Laino seeks the Court's permission to travel to Chocoura, New Hampshire either tomorrow or Friday (June 5, 2008 or June 6, 2008) to assist his sister, Linda Laino, with her move from New Hampshire to Staten Island, New York. Linda Laino recently had colorectal surgery. She is not doing well. Ms. Laino is relocating from New Hampshire in order to be closer to Defendant Steven Laino, who resides in Staten Island, so that he can assist with her care.

Presently, Mr. Laino's travel is restricted to the Southern and Eastern Districts of New York, the District of New Jersey, and the District of West Virginia (where Mr. Laino's son attends college). AUSA Moore has kindly consented to this request, as has Mr. Laino's Pretrial Services Officer, Jason Lerman.

Mr. Laino's trip to New Hampshire will be a one-time occurrence. Should the Court allow, Mr. Laino intends to depart Staten Island at approximately 6:00 a.m. on either June 5, 2008 or June 6, 2008 and travel directly to Chocoura, New Hampshire. Mr. Laino will pick up his sister, her belongings, and return directly back to New York on the same day. Given the five

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to six hour drive, we anticipate that Mr. Laino would depart New York at 6:00 a.m. and return no later than 11:00 p.m.

We appreciate the Government and Pretrial Service's consent to this request and are grateful to the Court for its time and consideration.

Respectfully submitted,
LAW OFFICE OF RONALD L. KUBY

A handwritten signature in black ink, appearing to read 'David Pressman', with a stylized, wavy line extending from the end.

DAVID PRESSMAN [DP-9136]

Attorneys for Mr. Laino

cc: AUSA Julian Moore (via facsimile)
Mr. Jason Lerman, Pretrial Services Officer (via facsimile)